

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

BRYAN REPETTO,	)	
	)	
Plaintiff	)	
	)	
v.	)	Civil Action No. 08-CV-101
	)	
ST. MATTHEW'S UNIVERSITY, INC. and	)	
ST. MATTHEWS UNIVERSITY (CAYMAN),	)	
INC.	)	
	)	
Defendants	)	

**PLAINTIFF'S CONSENTED-TO MOTION TO ENLARGE TIME, WITH  
INCORPORATED MEMORANDUM OF LAW**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff Bryan Repetto, with the consent of Defendant St. Matthew's University, Inc., moves this Court to enlarge by two weeks the time provided for his response to Defendant's Motion for Summary Judgment. The grounds for this Motion are as follows:

1. Defendants filed a Motion for Summary Judgment on October 21, 2008, as provided in the Court's Scheduling Order.
2. Plaintiff's Opposition to that Motion currently is due on Wednesday, November 12, 2008 (because November 11<sup>th</sup> is a federal holiday).
3. In the period since Defendants filed their Motion, the parties have been engaged in settlement discussions. The parties appear to be close to reaching a negotiated resolution to this matter.

4. It would undermine the progress of these discussions if Plaintiff's counsel were required to devote substantial amounts of time to completing the Opposition to Defendants' Motion.

5. In order to allow the parties to complete their negotiations, Plaintiff respectfully requests a two-week extension, until Tuesday, November 25<sup>th</sup>, of the time in which to file the Opposition to Defendant's Motion.

6. Defendants will not be unduly prejudiced by this brief extension of time, and – should negotiations fail – the extension will not interfere with the scheduled trial date in this matter.

7. Undersigned counsel has consulted with Defendant's counsel, Gail Cornwall, Esq., who consents to the relief requested in this motion.

WHEREFORE, Plaintiff respectfully requests that this Court enlarge the time for filing his Opposition to Defendants' Motion for Summary Judgment by two weeks, until November 25, 2008.

Dated: November 7, 2008

/s/ Barbara L. Goodwin  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on November 7, 2008, I electronically filed the following document(s):

- 1) PLAINTIFF'S CONSENTED-TO MOTION TO ENLARGE TIME, WITH INCORPORATED MEMORANDUM OF LAW

with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

GAIL CORNWALL, ESQ. – [gcornwall@eapdlaw.com](mailto:gcornwall@eapdlaw.com)

and I hereby certify that on November 11, 2008, I mailed by U.S. Postal Service, the document(s) to the following non-registered participants:

None.

/s/ Barbara L. Goodwin  
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